

CHLORINATED PARAFFINS

INDUSTRY ASSOCIATION

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June 17, 2009

Executive Director
Existing Substances Division
Environment Canada
Gatineau, Quebec K1A 0H3

VIA EMAIL: Existing.Substances.Existantes@ec.gc.ca

RE: Evaluation of the Bioaccumulation of Chlorinated Paraffins; Information for Consideration on the Proposed Order to Add Chlorinated Paraffins to Schedule 1 of the Canadian Environmental Protection Act (CEPA), 1999 (*Canada Gazette*, Part I, September 20, 2008)

Dear Minister of Environment:

The Chlorinated Paraffins Industry Association (CPIA¹) previously commented on, and submitted a Notice of Objection to, the September 20, 2008, notice in *Canada Gazette*, Part I, regarding Environment Canada's (EC) Proposed Order to add Chlorinated Paraffins (CPs) to the List of Toxic Substances in Schedule 1 of the Canadian Environmental Protection Act (CEPA), 1999 (the "Proposed Order"). This letter is to alert EC to several recent developments on the issue of bioaccumulation potential for CPs that have transpired since CPIA filed its comments and Notice of Objection last year.

Bioaccumulation is an important aspect of Canada's assessment of CPs, especially since it is a criterion for determining whether a chemical should be placed on the Virtual Elimination (VE) list. CPIA would like EC to consider the following important recent developments related to the bioaccumulation of mid-chain chlorinated paraffins (C14-C17) and the long-chain chlorinated paraffin product (C18-C20), which as CPIA previously reported, to the best of our knowledge is not used in Canada.

- The UK final risk assessment report for long-chain chlorinated paraffins (LCCPs), which we forwarded to EC in April 2009, concludes that C18-C20 CPs do not meet the bioaccumulation criterion. The report provides an extensive analysis of the bioaccumulation potential for the same LCCP subcategories (C18-C20 liquid, C20+ liquid, and C20+ solid) that Canada incorporated in its risk assessment and this assessment. The lack of bioaccumulation conclusion is also consistent with

¹ The Chlorinated Paraffins Industry Association (CPIA) represents manufacturers of chlorinated paraffins from around the world.

the European Chemical Bureau (ECB) PBT Working Group evaluation of LCCPs (ECB PBT List No. 110), which CPIA has also provided to EC.

- A new OECD Guideline 305 bioconcentration flow-through fish test is currently underway using a radiolabelled C₁₄ CP. This research will provide a better assessment of the bioaccumulation potential of one constituent of the mid-chain chlorinated paraffins (MCCPs) product. Previous recent research on a ¹⁴C-labelled chlorinated n-pentadecane in a mixture with unlabelled MCCPs (52.5% chlorine by weight) showed that the mean bioaccumulation factor from an actual study was 136 times smaller than the equivalent bioaccumulation determined for MCCPs using standard modelling methods. This significant over estimation of the bioaccumulation potential for MCCPs suggests that Canada should consider these additional new data before making a final decisions regarding the bioaccumulation potential of MCCPs and their placement on the VE list. A protocol for the study is attached.

CPIA continues to believe that Canada's own Risk Assessment should support the conclusion that LCCPs do not meet the criteria for CEPA toxic for either human health or the environment, including not meeting the criterion for bioaccumulation. CPIA also believes that EC should wait to consider this important new data on bioaccumulation potential that is being developed for MCCPs, before taking the significant step of placing MCCPs on the VE list. CPIA would welcome the opportunity to further discuss this matter with the appropriate officials.

Please let me know if we can provide any further clarification about this supplemental information or CPIA's original comments.

Sincerely,



Robert J. Fensterheim
Executive Director

Attached:

- 1) Protocol for OECD 305 Study of radiolabelled Chlorinated Tetradecane (C₁₄ CP).